

**IN RE:**  
**NICOLE ANTOINETTE BROOKINS**  
**Debtor**  
  
**NATIONSTAR MORTGAGE LLC,**  
**Movant**  
  
**v.**  
  
**NICOLE ANTOINETTE BROOKINS,**  
**Respondent**

**CHAPTER 13**  
  
**CASE NO. 1:22-bk-00311**

1. Admitted.
2. Admitted.
3. Admitted.
4. Proof of default is demanded at trial and this paragraph is therefore denied pending Debtor's research of payments made.
5. Proof of default is demanded at trial and this paragraph is therefore denied pending Debtor's research of payments made.
6. Proof of when next payment is due is demanded at trial and this averment is therefore denied. Denied that Movant is not adequately protected.
7. Proof of amount owed is demanded at trial and this paragraph is therefore denied.
8. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.

9. Denied that Movant has demonstrated cause for relief from stay.
10. Admitted.
11. Denied that Rule 4001(a)(3) should not be applicable and denied that the Movant should be allowed to immediately enforce and implement the Order granting relief from the automatic stay.
12. Denied that Movant has demonstrated cause for relief from the co-debtor stay.
13. Denied that Rule 3002.1 should be waived.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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